

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL NO.: 1:10-CR-10159-PBS
v.)	
)	
RICHARD SULLIVAN,)	
)	
Defendant.)	
)	

DEFENDANT’S MOTION TO SCHEDULE RULE 11 HEARING

Now comes the Defendant, Richard Sullivan, by and through counsel, and requests that this matter be scheduled for a plea hearing pursuant to Fed. R. Crim. P. 11. The parties have reached a written plea agreement, and the Defendant wishes to expedite the matter given the fact that he has been detained (at Donald Wyatt Detention Center) since August, 2023, and his likely sentence will soon be exceeded by the amount of time that he has already served in pretrial detention. In addition, the Defendant is 74 years of age, and not in great health.

WHEREFORE, for all these reasons, it is requested that this motion be allowed, and the matter be scheduled for a Rule 11 hearing on a date that is convenient for the Court and the parties.

Respectfully submitted,

RICHARD SULLIVAN

By his attorney,

/s/ Paul V. Kelly
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January 13, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Paul V. Kelly
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